

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

HARTFORD FIRE INSURANCE CO.,
Plaintiff,

vs.

EASTERN CONTRACTORS, INC.,
Defendant/Third-Party Plaintiff,

vs.

CITY OF LAWRENCE, CITY OF FALL
RIVER, AND FREETOWN/LAKEVILLE
REGIONAL SCHOOL DISTRICT
Third-Party Defendants.

C.A. No. 03-12502 RGS

**ASSENTED TO MOTION FOR ENLARGEMENT OF
TIME TO FILE INITIAL DISCLOSURES**

NOW COMES Third-Party Defendant City of Lawrence (the “City”) and hereby moves this Honorable Court, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, for an enlargement of time to file its initial disclosures. A copy of the City’s Initial Disclosures are attached hereto as Exhibit A.

IN SUPPORT OF ITS MOTION, the City states that, through inadvertence, its initial disclosures were not filed with the Court within the time required by the scheduling order in this case. See Clerk’s Notes Re: Scheduling Conference, held August 12, 2004. The oversight was recently discovered during the course of discovery in this action. To date there has been only limited document and written discovery conducted in this case and neither counsel for Plaintiff Hartford Fire Insurance Co. (“Hartford”) or Defendant/Third-Party Plaintiff Eastern Contractors,

Inc. ("Eastern") have objected to the City's untimely initial disclosures. In fact, Hartford has also failed, as of the date of his Motion, to make its initial disclosures in this case.

The City further maintains that no party will suffer prejudice by the granting of this Motion. To date, no dispositions have been taken, or are scheduled to be taken, in this action. The filing of the City's initial disclosures at this time will assist the parties with the orderly completion of discovery in advance of the November 30, 2005 discovery deadline.

Both Hartford and Eastern assent to the City's instant motion.

Respectfully submitted,

Third-Party Defendant/Third-Party Counterclaimant:

CITY OF LAWRENCE,

By its Attorneys,

Dated: April 14, 2005

/s/ Doreen M. Zankowski

Joel Lewin (BBO# 298040)

Doreen M. Zankowski (BBO# 558381)

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Defendant/Third-Party Plaintiff:

EASTERN CONTRACTORS, INC.

By its Attorneys,

/s/ Edward J. Quinlan

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Plaintiff:

HARTFORD FIRE INSURANCE CO.

By its Attorneys,

/s/ Bradford R. Carver

Bradford R. Carver, Esq. (BBO #565396)
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Two Seaport Lane, 10th Floor
Boston, MA 02110

CERTIFICATE OF SERVICE

I, Doreen M. Zankowski, hereby certify that on this 14th day of April 2005, I served a copy of the foregoing document on counsel of record electronically and by first class mail, postage prepaid.

/s/ Doreen M. Zankowski

Doreen M. Zankowski